

AARON D. FORD  
Attorney General  
TRISHA CHAPMAN (Bar No. 12716)  
Deputy Attorney General  
State of Nevada  
Office of the Attorney General  
555 E. Washington Avenue, Suite 3900  
Las Vegas, Nevada 89101  
Phone: (702) 486-3107  
Fax: (702) 486-2377  
tchapman@ag.nv.gov  
*Attorneys for Respondents*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PAUL SANTIAGO,  
  
Petitioner,  
  
vs.  
  
CALVIN JOHNSON, *et al.*,  
  
Respondents.

Case No.: 2:21-cv-00896-APG-NJK

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
RESPONSE TO SECOND AMENDED  
PETITION (ECF NO. 27)**

**(THIRD REQUEST)**

Respondents move this Court for an enlargement of time of 14 days from the current due date of January 13, 2023, up to and including January 27, 2023, in which to file their response to Paul Santiago's Second Amended Petition for a Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2254 (ECF No. 27). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the third enlargement of time sought by Respondents to file the response, and the request is brought in good faith and not for the purpose of delay.

DATED: January 13, 2023.

AARON D. FORD  
Attorney General

By: /s/ Trisha Chapman  
Trisha Chapman (Bar No. 12716)  
Deputy Attorney General

**DECLARATION OF TRISHA CHAPMAN**

I, TRISHA CHAPMAN, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Paul Santiago v. Calvin Johnson, et al.*, Case No. 2:21-cv-00896-APG-NJK, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The deadline to file a response to Santiago's Petition is January 13, 2023.

4. I have been unable with due diligence to timely complete the response herein. While I was able to get the state court record filed on time, I need additional time to finish the response to Santiago's petition, which is nearly complete. I believe two weeks is sufficient to finalize the response and get it filed. This request accounts for the upcoming federal holiday, my other professional deadlines, and the fact that my secretary is currently on annual leave and does not return until next week.

5. I have communicated with counsel for Santiago, and he has no objection to this request.

6. For the foregoing reasons, I respectfully request an enlargement of time of 14 days, up to and including January 27, 2023, in which to file a response to Santiago's Petition.

Executed on January 13, 2023.

/s/ Trisha Chapman  
Trisha Chapman (Bar No. 12716)

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

Dated: January 13, 2023